

Magistrate Judge David W. Christel

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Nov 02, 2023	
CLERK U.S. DISTRICT COURT	
WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY _____	DEPUTY

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff

v.

RYAN JAMES TOWNSEND,

Defendant.

CASE NO. 3:23-mj-05393

COMPLAINT for VIOLATION

Title 21, United States Code,  
Sections 841(a)(1) and 841(b)(1)(C) and  
Title 18, United States Code, Section  
924(c)(1)(A)(i)

BEFORE, David W. Christel, United States Magistrate Judge, U. S. Courthouse,  
Tacoma, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**

**(Possession of a Controlled Substance with Intent to Distribute )**

On or about August 2, 2023, in Pierce County, within the Western District of  
Washington, RYAN JAMES TOWNSEND, did knowingly and intentionally possess  
with intent to distribute methamphetamine, a substance controlled under Title 21, United  
States Code.

All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

**COUNT 2**

**(Carrying a Firearm During and In Relation to a Drug Trafficking Crime )**

On or about August 2, 2023, in Pierce County, within the Western District of Washington, RYAN JAMES TOWNSEND, knowingly carried a firearm, that is: a FN Five Seven handgun, during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States: *Possession of Controlled a Substance with Intent to Distribute*, as alleged in Count 1 above.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

And the complainant states that this Complaint is based on the following information:

I, DAVID LASALATA, being first duly sworn on oath, depose and say:

**AGENT BACKGROUND AND INTRODUCTION**

1. I am a Detective with the Puyallup Police Department and Task Force Officer with the DEA. I have been employed by the Puyallup Police Department since August 2016, and previously assigned to the Crime Suppression Unit from 2019 to 2020. I am currently assigned to the Tacoma Resident Office of the Drug Enforcement Administration. As a Task Force Officer with the DEA, I have been trained to investigate a variety of crimes, including cases involving violations of the Controlled Substance Act, Title 21, United States Code, Section 801 *et seq.*, and related offenses. I have received training in the enforcement and investigation of the Controlled Substance Act.

2. My formal training includes a Bachelor's Degree in Exercise Science and a Master's Degree in Education from Pacific Lutheran University. Upon joining the Puyallup Police Department, I completed 720 hours of training at the Basic Law Enforcement Academy, where I was trained in the areas of Criminal Investigations, Narcotics Investigation, Interview Skills, Criminal Law, Criminal Procedures, Court Orders, and Search Warrants. I have also completed the 80-hour Seattle Police

1 Undercover Operations/Investigations School as well as DEA Task Force Officer  
2 training. Additionally, I have completed Washington State Tactical Officer's  
3 Association (WSTOA) 60-hour Basic SWAT Course, 24-hour Advanced SWAT Course  
4 and 30-hour Tactical Response to Suicide Bombing. I have completed the Washington  
5 State Criminal Justice Training Commission 80-hour level-one defensive tactics  
6 instructor course and hold the position of Defensive Tactics Instructor for the Puyallup  
7 Police Department. I have attended over 70-hours of specific narcotics investigative  
8 training from both the California Narcotics Officers Association (CNOA) and  
9 Washington State Narcotics Investigators Association (WSNIA) on numerous drug-  
10 related topics.

11       3.       During the course of my law enforcement career, I have been involved in  
12 investigations of numerous criminal offenses, including the offenses involved in the  
13 current investigation. I have participated in criminal investigations of illicit drug  
14 trafficking organizations, ranging from street-level dealers to major dealers, to include  
15 Mexico-based drug trafficking organizations. These investigations have also included  
16 the unlawful possession with intent to distribute, and distribution of controlled  
17 substances; the related laundering of monetary instruments; the conducting of monetary  
18 transactions involving the proceeds of specified unlawful activities; and conspiracies  
19 associated with criminal narcotics offenses. These investigations have included use of  
20 the following investigative techniques: confidential informants; undercover agents;  
21 analysis of pen register, trap and trace, and toll records; physical and electronic  
22 surveillance; wiretaps; and the execution of search warrants. I have interviewed  
23 defendants at the time of their arrests and have debriefed, spoken with, or interviewed  
24 numerous drug dealers or confidential sources (informants), to include proffer  
25 interviews, who were experienced in speaking in coded conversations. I have gained  
26 knowledge regarding the various methods, techniques, codes, and/or jargon used by drug  
27 traffickers in the course of their criminal activities, including their use of cellular

1 telephones and other electronic devices to facilitate communications while avoiding law  
2 enforcement scrutiny.

3 4. I have authored, planned, and participated in the execution of search  
4 warrants authorizing the search of locations associated with drug traffickers and their co-  
5 conspirators, such as residences, businesses, storage facilities, and vehicles.  
6 Additionally, I have authored and supervised the execution of dozens of tracking  
7 warrants, including multiple tracking warrant affidavits for vehicles and cellular  
8 telephones.

9 5. I have worked on drug and gang investigations involving the use of court-  
10 authorized wiretaps under Title III. In that capacity, I have had the opportunity to  
11 monitor, and listen to the content of intercepted conversations involving the trafficking  
12 of methamphetamine, fentanyl, heroin, cocaine and other narcotics, by persons who used  
13 some form of code to attempt to thwart law enforcement detection.

14 6. I have trained with, analyzed, discussed, and learned from other law  
15 enforcement officers and investigators who have vast knowledge and experience these  
16 matters.

17 7. These investigations that I have been a part of have resulted in numerous  
18 state and federal prosecutions of individuals who have possessed or distributed  
19 controlled substances, including methamphetamine, heroin, suspected fentanyl pills, as  
20 well as the seizure of those illegal drugs and the proceeds from their sale.

21 8. The facts set forth in this affidavit arise from my personal and direct  
22 participation in the investigation, my experience and training as an DEA Task Force  
23 Officer, my conversations with witnesses and other law enforcement personnel,  
24 including consultations with other agents participating in this and related investigations,  
25 and my review of relevant documents and reports. I have not included every fact known  
26 to me or other investigative personnel concerning this investigation. My specialized  
27 training and experience in drug investigations as well as the assistance and input of

1 experienced fellow investigators, form a basis for my opinions and conclusions, which I  
2 drew from the facts set forth herein.

3 9. As set forth below, there is probable cause to believe that defendant Ryan  
4 James TOWNSEND, committed the criminal offenses alleged above in Counts 1 and 2.  
5 Since this affidavit is being submitted for the limited purpose of establishing probable  
6 cause, I have not included every fact known concerning this investigation. I have set  
7 forth only the facts I believe are essential for a fair determination of probable cause.

### 8 SUMMARY OF PROBABLE CAUSE

9 10. On August 2, 2023, Officer Dimitry Kulibaba was driving a marked black  
10 and white Puyallup Police Department (“PPD”) vehicle. Office Kulibaba attempted to  
11 stop a black Mercedes on the 1400 block of S. Meridian as the vehicle was not  
12 displaying a license plate. When Office Kulibaba attempted to pull the vehicle over, he  
13 observed that the driver accelerated and drove on to State Route (“SR”) 512 going  
14 eastbound. Officer Kulibaba did not attempt to pursue the vehicle, however Officer  
15 Kulibaba observed that the vehicle was stopped in traffic. Officer Kulibaba was able to  
16 pull up to the Mercedes and took photographs of the driver, who, as discussed in further  
17 detail below, was eventually identified as TOWNSEND.

18 11. After Officer Kulibaba took photographs of TOWNSEND, he observed the  
19 vehicle take the offramp to East Pioneer Street. Officer Kulibaba exited SR512 at East  
20 Pioneer Street, and observed the Mercedes driven by TOWNSEND was involved in a  
21 collision with a second vehicle. Officer Kulibaba observed that the driver of the vehicle  
22 had fled the scene.

23 12. PPD Officer Nathan Jendrick, who had received the picture of  
24 TOWNSEND driving the Mercedes, observed TOWNSEND walking east on East  
25 Pioneer Street. When Officer Jendrick attempted to stop TOWNSEND, TOWNSEND  
26 fled on foot, running southbound. TOWNSEND was eventually taken into custody after  
27 a foot pursuit.

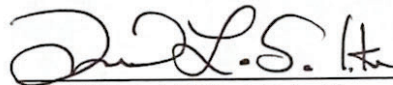
13. After TOWNSEND was taken into custody, PPD officers obtained a search  
warrant for his Mercedes. During the search of the Mercedes, officers recovered a digital



1 scale, and a black shoulder bag that contained a large plastic bag of methamphetamine  
2 that weighed 300 gross grams, and a second plastic bag containing approximately 14  
3 gross grams of additional methamphetamine. Underneath the black shoulder bag,  
4 officers recovered two debit cards in TOWNSEND's name. In the glove box, officers  
5 recovered a loaded FN Five Seven handgun, with one round in the chamber and a loaded  
6 magazine.

7 14. I know, based on my training and experience, that the above-described  
8 controlled substances are inconsistent with personal use, and are more consistent with  
9 distribution quantities of controlled substances.

10 15. Based on the above facts, I respectfully submit that there is probable cause  
11 to believe that Ryan James TOWNSEND committed the drug and firearm offenses  
12 alleged in this Complaint.

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14 

15 DAVID LASALATA, Complainant  
16 Task Force Officer, DEA

17  
18 Based on the Complaint and Affidavit sworn to before me, and subscribed in my  
19 presence, the Court hereby finds that there is probable cause to believe the Defendant  
20 committed the offense set forth in the Complaint.

21 Dated this 2nd day of November, 2023.

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24 DAVID W. CHRISTEL  
25 United States Magistrate Judge  
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